

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

In re DOWNSTREAM ADDICKS
AND BARKER (TEXAS) FLOOD-
CONTROL RESERVOIRS

Sub-Master Docket No. 17-9002 L

THIS DOCUMENT RELATES TO:

20-701 L

YOUNG et al. v. UNITED STATES OF
AMERICA, CASE NO: 1:17-CV-01545

PLAINTIFFS' SHORT FORM COMPLAINT

By submitting this document, Plaintiff(s) adopts and incorporates by reference the Consolidated And Amended Downstream Master Complaint (ECF No. 23) filed in the above-styled Sub-Master Docket on January 16, 2018, and all subsequent amendments to that Complaint. The Plaintiffs' Short Form Complaint is deemed Plaintiffs' Original Complaint if it is plaintiffs' original pleading and must be filed as a new complaint through the Court's CM/ECF system.

If Plaintiffs have previously filed an Original Complaint, the filing of a Plaintiffs' Short Form Complaint amends and supersedes any prior complaint filed by the below-listed Plaintiff(s) *In re Addicks and Barker (Texas) Flood-Control Reservoirs*, Master Docket No. 17-3000L and/or *In re Downstream Addicks and Barker (Texas) Flood-Control Reservoirs*, Sub-Master Docket No. 17-9002L.

1. Name of Plaintiff(s):

- 1.1 Sejla Bakalovic and Bamir Rudic
- 1.2 Briarhills Office, Ltd.
- 1.3 Richard and Beverly Bugler
- 1.4 Allen Caine as Trustee of the Allen Caine and Dorothy Caine Living Trust
- 1.5 Thomas Damsgaard

- 1.6 Helena De Ferro
- 1.7 Bruce and Blanca Franklin
- 1.8 Fernando De Carvalho and Rosa Frimm
- 1.9 Michael and Penelope P. Lawson
- 1.10 John and Heather Papadopoulos
- 1.11 Risa Pippin, Individually and as Executor of the Estate of George Keiller
- 1.12 Steven and Dawn Rasch
- 1.13 Gabrielle Strout
- 1.14 John Sutter and Jean Ann Dieudonne
- 1.15 Marceline "Cookie" Sutter
- 1.16 Maurice and Jennifer Teixeira
- 1.17 Thomas E. and Nancy N. Tucker
- 1.18 Charlie and Linda Whitson
- 1.19 Steve Wortham

2. Location by address of Plaintiff(s) property subject to Plaintiff(s) allegations of a Fifth Amendment taking without just compensation as a result of Addicks/Barker reservoir releases:

- 1.1 12931 Traviata Drive, Houston, TX 77024
- 1.2 14515 Briarhills Parkway, Houston, TX 77077
- 1.3 918 Daria Drive, Houston, TX 77079
- 1.4 306 West Sam Houston Parkway, Houston, TX 77042
- 1.5 10714 Bayou Glen Road, Houston, TX 77042-1104
- 1.6 604 N. Eldridge Parkway, Houston, TX 77042
- 1.7 10711 Russett Drive, Houston, TX 77042
- 1.8 509 White Wing Lane, Houston, TX 77079-6810
- 1.9 201 Vanderpool Lane No. 32, Houston, TX 77024
- 1.10 10723 Bayou Glen Road, Houston, TX 77042

- 1.11 14751 Quail Grove Lane, Houston, TX 77079
- 1.12 14907 River Forest Drive, Houston, Texas 77079
- 1.13 15755 Foxgate Road, Houston, TX 77079
- 1.14 1310 Chardonnay Drive, Houston, TX 77077
- 1.15 626 Langwood, Houston, TX 77079
- 1.16 14105 Cardinal Lane, Houston, TX 77079
- 1.17 407 Ramblewood Road, Houston, TX 77079
- 1.18 14350 Carolcrest Drive, Houston, TX 77079
- 1.19 14111 Kellywood Dr., Houston, TX 77079

a. Tax number for identified property:

- 1.1 870730000001
- 1.2 1079540000005
- 1.3 1075180000017
- 1.4 923670000005
- 1.5 985280000033
- 1.6 1080190000002
- 1.7 982900000024
- 1.8 833060000026
- 1.9 1043940000032
- 1.10 985280010031
- 1.11 1000030000001
- 1.12 1000760000002
- 1.13 1052040000053
- 1.14 1071150040006
- 1.15 1003700000012
- 1.16 961690000017
- 1.17 961510000015
- 1.18 965230000026
- 1.19 0961710000004

b. Real property interest possessed by Plaintiff(s) alleged to have been taken

Ownership (*i.e.*, fee simple) XX Leasehold Other

c. Manner of alleged taking of the property interest(s) listed in paragraph 2(b) above

Temporary Permanent Both XX

3. Type of property alleged to have been taken:

Real Property Personal Property Both XX

Respectfully submitted,

/s/ Richard Warren Mithoff

Richard Warren Mithoff, *Attorney of Record*

Texas Bar No. 14228500

Federal ID No. 2102

Email: rmithoff@mithofflaw.com

Warner V. Hocker, *of counsel*

Texas Bar No. 24074422

Federal ID No. 11333732

Email: whoocker@mithofflaw.com

MITHOFF LAW

500 Dallas Street, Suite 3450

Houston, Texas 77002

Telephone: 713 654 1122

Facsimile: 713 739 8085

CERTIFICATE OF SERVICE

I, Richard W. Mithoff, an attorney, hereby certify that on June 10, 2020, I caused the foregoing document to be filed and served on all counsel of record in the above-captioned case via the Court's CM/ECF electronic filing system.

/s/ Richard Warren Mithoff

Richard Warren Mithoff